

1 R. David Hosp  
2 ORRICK, HERRINGTON & SUTCLIFFE, LLP  
3 222 Berkeley St. Ste 2000  
4 Boston, MA 02116  
5 Telephone: (617) 880-1886  
6 Facsimile: (617) 880-1801  
7 Email: dhosp@orrick.com

8 Paige Pavone  
9 ORRICK, HERRINGTON & SUTCLIFFE, LLP  
10 51 West 52<sup>nd</sup> Street  
11 New York, NY 10019  
12 Telephone: (212) 506-3604  
13 Facsimile: (212) 506-5151  
14 Email: ppavone@orrick.com

15 *Attorneys for Plaintiffs*

16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF NEW MEXICO

18 FRANKLIN GOMEZ CARRANZA and  
19 RUBEN TORRES JAUREGUI,

20 Plaintiffs,

21 v.

22 UNITED STATES IMMIGRATION AND  
23 CUSTOMS ENFORCEMENT, et al.,  
24 Defendants.

Case No. 20-CV-424

**DECLARATION OF DAVID JACKSON  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION**

1 I, David Jackson, declare as follows:

- 2 1. I make this declaration from my personal knowledge and, if called to testify to these  
3 facts, could and would do so competently.
- 4 2. As the Supervising Intake Specialist, I am responsible for scheduling phone calls with  
5 clients and potential clients at both El Paso Service Processing Center and Otero  
6 County Processing Center so that volunteers and myself have intake consultations with  
7 these individuals.
- 8 3. As of 3/19/2020 up until 5/13/2020, I have missed approximately 20-25 calls with  
9 clients and potential clients at Otero County Processing Center.
- 10 4. I have waited up to 4 hours to receive calls from Otero which is not included in the  
11 missed calls.
- 12 5. I have been denied access to free legal calls with clients and potential clients left with  
13 the option of pursuing legal calls at the cost of the detainee at Otero County Processing  
14 Center.
- 15 6. I have been denied access to three-way call capabilities for interpreter purposes to  
16 accommodate non-Spanish speaking detainees.
- 17 7. As of 3/19/2020 up until 5/13/2020, I have missed approximately 8-12 calls with clients  
18 and potential clients at El Paso Service Processing Center.
- 19 8. I have waited up to 6 hours to receive calls from El Paso Service Processing Center  
20 which is not included in the missed calls.
- 21 9. Both facilities have experienced difficulty in securing privacy for legal-confidential  
22 calls. Both facilities have experienced numerous call-drops where the calls end pre-  
23 maturely.
- 24  
25  
26  
27

1 10. Las Americas Detained Deportation Team's intake process is the first step to providing  
2 free legal services to those who are detained by attaining information from each  
3 detainee to have them processed into our screening, prior to representing or advocating  
4 for them.

5 As of 3/19/2020 until now, roughly 35 detainees have been denied access to our intake  
6 process due to the lack of cooperation of setting free legal calls on the part of Otero.  
7

8 11. I declare under penalty of perjury that the foregoing is true and correct to the best of  
9 my knowledge. Executed on 5/13/2020 in El Paso, Texas.

10  
11 /s/ David Jackson

12 David Jackson  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27